

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

INTERTRUST TECHNOLOGIES
CORPORATION,

Plaintiff,

v.

CINEMARK HOLDINGS, INC.,

AMC ENTERTAINMENT HOLDINGS,
INC.,

REGAL ENTERTAINMENT GROUP,

Defendants.

2:19-cv-00266-JRG (LEAD CASE)

2:19-cv-00265-JRG

2:19-cv-00267-JRG

JOINT MOTION FOR ENTRY OF DOCKET CONTROL ORDER

Plaintiff Intertrust Technologies Corporation and Defendants AMC Entertainment Holdings, Inc. (“AMC”), Cinemark Holdings, Inc. (“Cinemark”), and Regal Entertainment Group (“Regal”) (collectively “the Parties”) file this Joint Motion for Entry of Docket Control Order.

The parties have conferred and come to an agreement to all terms of the proposed Docket Control Order. As shown in the table below, the parties jointly request to move certain asterisked dates that the Court provided in the sample docket control order given out at the scheduling conference.

Sample Deadline	Proposed Deadline	Event
October 13, 2020	October 20, 2020	*Response to Dispositive Motions (including <i>Daubert</i> Motions). Responses to dispositive motions that were filed <u>prior</u> to the dispositive motion deadline, including <i>Daubert</i> Motions, shall be due in accordance with Local Rule CV-7(e), not to exceed the deadline as set forth in this Docket Control Order. Motions for Summary Judgment shall comply with Local Rule CV-56.
September 28, 2020	October 5, 2020	*File Motions to Strike Expert Testimony (including <i>Daubert</i> Motions) No motion to strike expert testimony (including a <i>Daubert</i> motion) may be filed after this date without leave of the Court.
September 28, 2020	October 5, 2020	*File Dispositive Motions No dispositive motion may be filed after this date without leave of the Court. Motions shall comply with Local Rule CV-56 and Local Rule CV-7. <u>Motions to extend page limits will only be granted in exceptional circumstances. Exceptional circumstances require more than agreement among the parties.</u>
May 26, 2020	May 22, 2020	*Comply with P.R. 4-5(c) (Reply Claim Construction Brief)

As shown above, the Parties ask to move forward the deadline to comply with P.R. 4-5(c). The Parties believe good cause exists for this change so that the Reply Claim Construction Brief will be filed before Memorial Day, providing the Court with additional time to review the Parties' completed claim construction briefing. In addition, the Parties ask to move the deadlines for filing dispositive motions and motions to strike expert testimony (including *Daubert* motions), and the deadline for filing responses to such motions. The Parties believe good cause exists for these

changes to provide more separation between the close of expert discovery and the filing of dispositive motions and motions to strike expert testimony, without impacting the remainder of the schedule.

The proposed Docket Control Order is attached with this filing.

DATED: December 4, 2019

/s/ Harold A. Barza w/permission Andrea L. Fair

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***Counsel for Plaintiff Intertrust Technologies
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DATED: December 4, 2019

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Counsel for Defendants AMC Entertainment Holdings, Inc., Cinemark Holdings, Inc., and Regal Entertainment Group

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service on this the 4th day of December, 2019.

/s/ Andrea L. Fair